

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>EDWARD STEWART,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DAVID FELDMAN, <i>et al.</i>,</p> <p style="text-align: right;">Defendants.</p>	
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Civil Action No.

2:20-cv-00776-JG

O R D E R

AND NOW, to wit, as of this ____ day of _____, 2020, upon due consideration, it is hereby ORDERED and DECREED that Defendants' Motion for Enlargement of Time is GRANTED, and Defendants are afforded until November 4, 2020 to finish compliance with this Court's Order of October 22, 2020.

BY THE COURT:

**HON. JOHN GALLAGHER
U.S.D.J.**

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>EDWARD STEWART,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DAVID FELDMAN, <i>et al.</i>,</p> <p style="text-align: right;">Defendants.</p>	
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**DEFENDANTS' DAVID FELDMAN ET AL'S
MOTION FOR ENLARGMENT OF TIME**

To The Honorable Court:

For the reasons set forth in the accompanying Memorandum of Law, your Defendants respectfully request that this Court grant defendants' Motion for Enlargement of Time.

Respectfully submitted,

10/29/2020

LAW OFFICE OF SIMON ROSEN, PLLC

By: /Simon Rosen, Esq./ (#6279)

Counsel for Defendants/Movants

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<p>EDWARD STEWART,</p> <p style="text-align: right;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>DAVID FELDMAN, <i>et al.</i>,</p> <p style="text-align: right;">Defendants.</p>	
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**MEMORANDUM OF LAW IN SUPPORT OF DEFENDANTS’
MOTION FOR ENLARGMENT OF TIME**

Defendants David Feldman, Bare Knuckle, LLC, Bare Knuckle Boxing, LLC, ABC Corp. 1-15, and John Does 1-15 (collectively, the “Feldman Defendants”), by and through their undersigned counsel, hereby submit this memorandum of law in support of their motion for enlargement of time, as follows.

I. FACTS

On October 22, 2020, after telephonic discovery-related status conference with counsel, this Court entered an Order affording defendants through October 29, 2020 to complete their compliance with plaintiff’s request for production of documents. This Order was entered in light of the fact that substantial documents were produced prior to 10/22/20. On October 28, 2020,

defendants produced twelve (12) sets of documents in compliance with plaintiff's requests, and on October 29, 2020, defendants produced seventy-three (73) documents, or sets of documents, in compliance thereof.

Defendants and counsel certify that defendants require an additional Three (3) business days, through Wednesday November 4, 2020, to ensure that all documents, consisting primarily of emails and/or text messages sought by plaintiff, are located and produced. Although defendants produced numerous emails and strings or emails in compliance with this Court's most recent Order, there remains the possibility certain documents, such as emails and/or text messages may be available to defendants, therefore this additional period of time is requested. Due to technical issues, defendants were unable to access documents by 10/29/20, and require additional time to do so.

II. ARGUMENT

At the most recent telephonic status conference, plaintiff identified the remaining documents sought, and defendants have substantially complied. More than eighty-five (85) documents (or sets of documents) were produced.

It is within this Court's discretion to afford defendants three (3) additional business days to turnover additional document. No undue prejudice shall befall defendants, and defendants full compliance shall occur by November 4.

For the above reasons, and in accordance with supportive legal authority provided to this Court in prior Memoranda, the motion for enlargement should be granted.

WHEREFORE, defendants David Feldman, Sr. et al. respectfully request that this Court GRANT their Motion for Enlargement of Time.

Dated: October 29, 2020

Respectfully submitted,

LAW OFFICE OF SIMON ROSEN, PLLC

By: /Simon Rosen, Esq./ (#6279)

Counsel for Defendants/Movants

ATTY ID NO. 38603
128 Greenwood Avenue
Wyncote PA 19095
Tel. (215)564-0212 Fax (215)893-3900
Email: SimonOnKey@aol.com

CERTIFICATE OF SERVICE

I, Simon Rosen, Esq., hereby Certify that a true and correct copy of the within Motion for Enlargement and accompanying papers was duly served upon all interested by parties on 10-29-20 through the Court's ECF Filing system.

Dated: 10-29-20

/Simon Rosen, Esq./